

# EXHIBIT A



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Attorneys for *Plaintiff*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF ARIZONA**

Valentino Dimitrov, individually, and on  
behalf of all others similarly situated;

Plaintiffs,

vs.

Stavatti Aerospace, Ltd, a Minnesota  
corporation; Stavatti Aerospace, Ltd, a  
Wyoming corporation; Stavatti  
Corporation, a Minnesota corporation;  
Stavatti Immobiliare, Ltd, a Wyoming  
corporation; Stavatti Industries, Ltd, a  
Wyoming corporation; Stavatti Niagara,  
Ltd., a New York corporation; Stavatti  
Super Fulcrum, Ltd, a Wyoming  
corporation; Stavatti Ukraine, a Ukrainian  
business entity; Stavatti Ukraine, a  
Ukrainian business entity; Stavatti Heavy  
Industries Ltd, a Hawaii corporation;  
Christopher Beskar and Maja Beskar,  
husband and wife; John Simon and Jean  
Simon, husband and wife; William  
McEwen and Patricia McEwen, husband  
wife; Rudy Chacon and Jane Doe Chacon,  
husband and wife; and DOES 1 through  
10, inclusive,

Defendants.

Case No.: 2:23-CV-00226-PHX-DJH

**DECLARATION OF GEORGE  
CHEBAT IN SUPPORT OF  
APPLICATION FOR ENTRY OF  
DEFAULT AGAINST DEFENDANTS  
STAVATTI CORPORATION,  
CHRISTOPHER BESKAR, PATRICIA  
MCWEWEN, WILLIAM MCEWEN,  
AND JEAN SIMON**

1 I, George Chebat, declare under penalty of perjury that the following is true and  
2 correct:

3 1. I am one of the attorneys for Plaintiff and I am familiar with the file, records,  
4 and pleadings in this matter.

5 2. The Complaint was filed on February 3, 2023. (Doc. 1)

6 3. Defendant Stavatti Corporation, a Minnesota corporation, was served on  
7 April 16, 2023, as reflected in the proof of service filed May 25, 2023. (Doc. 16).

8 4. Defendant Christopher Beskar was served on April 16, 2023, as reflected in  
9 the proof of service filed on May 25, 2023. *Id.*

10 5. Defendant Patricia Mcewen was served on April 14, 2023, as reflected in  
11 the proof of service filed on May 25, 2023. *Id.*

12 6. Defendant William Mcewen was served on April 16, 2023, as reflected in  
13 the proof of service filed on May 25, 2023. *Id.*

14 7. Defendant Jean Simon was served on April 26, 2023, as reflected in the  
15 proof of service filed on May 25, 2023. *Id.*

16 8. Defendants Stavatti Corporation, Christopher Beskar, Patricia Mcewen,  
17 William Mcewen, and Jean Simon's Answers or other responses to the Complaint were  
18 due on or before May 26, 2023.

19 9. To date, the above-named Defendants have failed to plead or otherwise  
20 defend within the time allowed and therefore are now in default.

21 10. Plaintiff requests that the Clerk of the Court enter default against each of the  
22 Defendants, jointly and severally.

23 11. In compliance with the requirements of 50 U.S.C. § 520, I verify that to the  
24 best of my knowledge, information, and belief, the Defendants are not in the military  
25 service.

1 WHEREFORE, the undersigned requests the Clerk of this Court enter default of  
2 the Defendants Stavatti Corporation; Christopher Beskar; Patricia Mcewen and William  
3 Mcewen, husband and wife; and Jean Simon.  
4

5 **DATED** this 9th day of June 9, 2023.  
6

7 **ENARA LAW, PLLC**

8 By: /s/ George K. Chebat  
9 George K. Chebat  
10 Joseph J. Toboni  
11 Daniel de Julio  
12 *Attorneys for Plaintiff*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 9th day of June 2023, copy of the foregoing was transmitted electronically to the CM/ECF filing system for filing and transmittal along with copies transmitted to all counsel of record via the CM/ECF system.

By: /s/ Shelly N. Witgen, ACP